



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

DEC 22 2014

REPLY TO THE ATTENTION OF:

**CERTIFIED MAIL #7009 1680 0000 7677 8138**  
**RETURN RECEIPT REQUESTED**

Mr. Trevor Nielson  
Production Manager  
Print Craft, Incorporated  
315 5<sup>th</sup> Avenue NW  
New Brighton, Minnesota 55112

Re: Notice of Violation  
RCRA Compliance Evaluation Inspection – Print Craft, Inc.  
EPA ID No.: MND 982 623 357

Dear Mr. Nielson:

On November 12, 2014 a representative of the U.S. Environmental Protection Agency inspected the Print Craft, Inc. (Print Craft) facility, located in New Brighton, Minnesota. As a large quantity generator of hazardous waste, Print Craft is subject to the Resource Conservation and Recovery Act (RCRA); 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Print Craft's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Print Craft, EPA's review of records pertaining to Print Craft, and the inspector's observations, EPA has determined that Print Craft has unlawfully stored hazardous waste without a permit or interim status as a result of Print Craft's failure to comply with certain conditions for a permit exemption under Minn. R. 7045.0292, Subparts 1 and 8 [40 CFR 262.34(a) and (c)]. EPA has identified the permit exemption conditions with which Print Craft was out of compliance at the time of the inspection in paragraphs 1-5, below.

Many of the conditions for the RCRA permit exemption are also independent requirements that apply to permitted and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its



permit exemption due to failure to comply with an exemption condition incorporated from Minn. R. 7045.0292, the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirements. The exemption conditions identified in paragraphs 1-3 are also independent TSD requirement incorporated from Minn. R. 7045.0552. Accordingly, each failure of Print Craft to comply with these conditions is also a violation of the corresponding requirement in Minn. R. 7045.0552.

#### STORAGE OF HAZARDOUS WASTE WITHOUT A PERMIT OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, Print Craft was out of compliance with the following large quantity generator permit exemption conditions:

1. Training

A large quantity generator of hazardous waste must maintain a written job description for each position at the facility related to hazardous waste management. *See* Minn. R. 7045.0558, subpart 6(A) [40 CFR §§ 262.34(a)(4) and 265.16(d)(1)].

At the time of the inspection, Print Craft did not have, and was unable to provide in response to a request, a written description for each position related to hazardous waste management at the facility.

2. Contingency Plan

A large quantity generator must submit a copy of its contingency plan and revisions to the plan to the local police department, fire department, hospital, and state and local emergency response teams that may be called upon to provide emergency services. *See*, Minn. R. 7045.0572, Subpart 5(B) [40 CFR §§ 262.34(a)(4) and 265.53(b)].

At the time of the inspection, Print Craft had not submitted a copy of the facility contingency plan to the local police department, fire department, hospital, and state and local emergency response teams that may be called upon to provide emergency services.

3. Contingency Plan

A large quantity generator's written contingency plan must include, among other things, the names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinator. *See*, Minn. R. 7045.0572 Subpart 4(D) [40 CFR §§262.34(a)(4) and 265.52(d)].

At the time of the inspection, Print Craft's contingency plan did not list the home telephone numbers of the alternate emergency coordinators.

4. Marking/Identification Requirements

A large quantity generator of hazardous waste must properly label hazardous waste satellite accumulation containers with the words, "Hazardous Waste" and a clear description of their contents. See, Minn. R, 7045.0292, Subpart 8(B)(2).

At the time of the inspection, Print Craft's labeled a 55-gallon satellite accumulation container of waste petroleum distillates (waste solvent) as "combustible liquid."

5. Marking/Identification Requirements

A large quantity generator of hazardous waste must properly label hazardous waste containers and tanks with the words, "Hazardous Waste" and with a description that clearly identifies the contents to employees and emergency personnel. See, Minn. R, 7045.0292, Subpart 1(F).

At the time of the inspection, Print Craft's labeled three 55-gallon containers of waste petroleum distillates (waste solvent) as "combustible liquid."

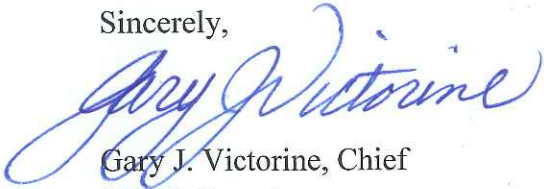
**Summary:** By failing to comply with the conditions for a permit exemption, above, Print Craft became an operator of a hazardous waste storage facility, and was required to obtain a Minnesota hazardous waste storage permit. Print Craft failed to apply for such a permit. Print Craft's failure to apply for and obtain a hazardous waste storage permit violated the requirements of Minn. R. 7045.0292, subpart 1, items A-G; 7001.0520 subpart 1, item A; 7001.0530; and 7001.0550 [40 CFR §§ 270.1(c), and 270.10(a) and (d)].

During the inspection, as observed by EPA, you took action to establish compliance with the above marking/identification requirements in paragraphs 4 and 5. According to Section 3008(a) of the RCRA, EPA may issue an order assessing a civil penalty for any past or current violation, requiring compliance immediately or within a specified time period, or both. Although this letter is not such an order, or a request for information under Section 3007 of RCRA, 42 U.S.C. CFR § 6927, we request that you submit a response in writing to us no later than thirty (30) days after receipt of this letter documenting the actions, if any, you have taken related to paragraphs 1-3.

You should submit your response to Sheila Burrus, U.S. Environmental Protection Agency, Region 5, 77 W. Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions regarding this letter, please contact Ms. Sheila Burrus, of my staff, at (312) 886-3587.

Sincerely,



Gary J. Victorine, Chief  
RCRA Branch

Enclosure

cc: John Elling, MPCA (john.elling@state.mn.us)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 W. JACKSON BOULEVARD  
CHICAGO, IL 60604

INSTALLATION NAME: Print Craft, Inc.  
U.S. EPA ID. No.: MND 982 623 357  
LOCATION ADDRESS: 315 5<sup>th</sup> Avenue NW  
New Brighton, MN 55112  
DATE OF INSPECTION: November 12, 2014  
U.S. EPA INSPECTOR: Sheila Burrus

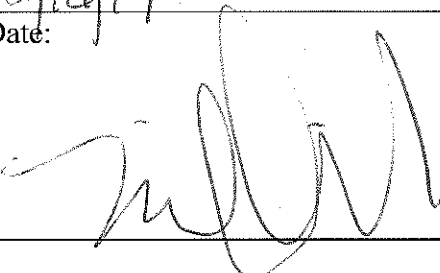
PREPARED BY:



Sheila Burrus  
Environmental Protection Specialist

12/16/14  
Date:

REVIEWED BY:



Michael Cunningham, Chief  
Compliance Section 1  
RCRA Branch  
Land and Chemicals Division

12/16/14  
Date:





### Purpose of Inspection

The purpose of the inspection was to conduct an un-announced compliance evaluation inspection (CEI) at Print Craft, Inc. (Print Craft), located at 315 5<sup>th</sup> Avenue NW, New Brighton, Minnesota, to evaluate Print Craft's compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically those regulations related to the management of hazardous waste and used oil.

Participants: Trevor Nielson, Production Manager represented Print Craft, Inc. Sheila Burrus represented EPA Region 5, Land and Chemicals Division.

### Installation Description/Background

Print Craft is a specialty print (lithographic) and packaging company. Some of its customers are U.S. Bank, Best Buy, and Ameriprise.

Print Craft has five printing presses and one five-color printing press. Print Craft generates a majority of its hazardous waste solvent from the cleaning of its 5-color printing press. The five color printing press blanket washer sprays solvent onto a cleaning brush and the excess solvent waste is transferred from connected hose into 3-gallon satellite accumulation containers before being transferred once per work shift into a 55-gallon satellite accumulation container.

A review of hazardous waste manifests and waste volume on-site indicates that Print Craft, Inc. has been operating as a large quantity generator since December 2013.

### Waste Generation

The facility generates hazardous waste solvent (D001/D018) from the roller wash system and blanket washer on the printing presses.

Print Craft also generates used oil from maintenance operations.

### Opening Conference

I arrived at Print Craft at 8:50 a.m. on November 12, 2014. I introduced myself to the receptionist who contacted Trevor Nielson, Production Manager. I presented my credentials to Mr. Nielson and explained the purpose of my visit. I was then escorted to the Mr. Nielson's office where I began to explain that I would be conducting a CEI that included a visual site inspection (VSI) and records review. I explained to him what specific records I would need to review and then asked him for a brief description of the

type of work done at this installation and the types of wastes generated. Mr. Nielson began to provide background and waste stream information about Print Craft which is included above in the installation description/background and waste generation sections of this report.

I provided a Small Business Resource Information Sheet, the Keys to Success brochure, the U.S. EPA – Region 5 Pollution Prevention Technical Assistance Contacts list and the U.S. EPA Managing Used Oil Advice for Small Business brochure to Mr. Nielson.

I informed Mr. Nielson that Print Craft could claim any information gathered during the inspection as Confidential Business Information (CBI) including: verbal information, documents and photographs. Mr. Nielson did not make a CBI claim on the information gathered during the inspection.

I continued the opening conference by asking Mr. Nielson who picks up Print Craft's hazardous waste and used oil. Mr. Nielson indicated that Safety Kleen located in Blaine, Minnesota picks up Print Craft's hazardous waste and used oil.

I then asked Mr. Nielson who picks up Print Craft's universal waste lamps. Mr. Nielson indicated that Parnell Enterprises, Inc. located in Oakdale, Minnesota picks up its universal waste lamps.

I began the CEI by conducting the records review portion of the inspection.

### **Records Review**

I began the records review portion of the inspection with the assistance of Mr. Nielson. I informed Mr. Nielson that I wanted to review hazardous waste manifests, annual reports, weekly inspection logs for the 90 day hazardous waste storage area and training records for the year 2014. I also requested land disposal restriction forms, waste analysis data and the most current contingency plan.

### **Contingency Plan**

Print Craft was unable to produce documentation showing that copies of its contingency plan had been submitted to local emergency authorities.

Print Craft's contingency plan did not include the home telephone number of the alternate emergency coordinators.

I reviewed hazardous waste manifests, annual reports, weekly inspection logs for the 90 day hazardous waste storage area, training records, land disposal restriction forms and waste analysis data and found them to be complete.

### Personnel Training/Job Descriptions

Print Craft was unable to produce job descriptions for review at the time of the inspection.

### Visual Site Inspection (VSI)

I was accompanied by Mr. Nielson during the VSI portion of the inspection. The areas of Print Craft's facility inspected included, but was not limited to: production area, chemical storage area, warehouse, glue area, stitching area, folding area, cutters and hand binding area

The following is a summary of information obtained while touring the plant.

- There were five, 3-gallon labeled/closed satellite accumulation containers of waste petroleum distillates (waste solvent) next to the 5-color printing press (Photographs 1 and 2).
- There was a 55-gallon satellite accumulation container of waste solvent located near the 5-color printing press. The hazardous waste label on the container described the waste as combustible liquid instead of waste petroleum distillates (waste solvent). The label was immediately removed and replaced with a hazardous waste label with the description of waste petroleum distillates (Photographs 3 and 4).
- There was one closed/labeled container of waste lamps in the chemical storage room (Photograph 5).
- There was one closed/labeled full and one partially filled 55-gallon containers of used oil in the chemical storage area (Photograph 6 and 7).
- There were four closed containers of hazardous waste petroleum distillates (waste solvent) in the chemical storage room. The hazardous waste labels on three of the containers described the waste as combustible liquid instead of as waste petroleum distillates. The labels were immediately removed and replaced with a hazardous waste label with the description of waste petroleum distillates (Photographs 8 through 12).

- Additional photographs of the numerous departments throughout the facility (Photographs 13 through 22).

In walking through the Print Craft's facility, I observed the presence of fire extinguishers and eyewash stations throughout the facility.

### **Closing Conference**

In closing, a brief conference was held with Mr. Nielson. I summarized where Mr. Nielson had taken me during the VSI and what information was presented to me. I summarized my compliance evaluation inspection during the closing conference and thanked Mr. Nielson for his cooperation and concluded the CEI at approximately 12:00 noon.

Attachment

Inspection Checklist  
Photographs 1 through 22

## Minnesota Pollution Control Agency

Report Title: Large Quantity Generator (LQG) Compliance Evaluation Inspection Checklist

Preferred ID: MND 982.623.357 Regulated Party: Print Craft, Inc.

Date: 11/13/14 Inspector: Shelia Burrus

### G1: Licensing / EPA / Permits

Rule	Requirement	Compliance Status	Remarks
7045.0221	Has Regulated Party obtained a generator identification number?	Yes	
7045.1020 A	Metro Area - Does the Regulated Party have an approved license?	Yes	
7045.0225 1	Outstate - Does the site have a current hazardous waste generator license?	Yes	5/1/14 - 4/30/15
7045.0230 1, B	Outstate - Did the Regulated Party include all hazardous waste streams on its license application?	Yes	
7045.0225 2	Is the Regulated Party's license displayed in a public area at the licensed site?	Yes	
7001.0520 1, A	Does the Regulated Party operate as a TSD without a permit?	NO	
MS 116.48 1	Are aboveground tanks >500 G registered with the MPCA? Are underground tanks registered with the MPCA?	N/A	

### G1: Waste Evaluation

Rule	Requirement	Compliance Status	Remarks
7045.0214 1	Have wastes been evaluated within 60 days of the date they were initially generated?	Yes	
7045.0294 3	Are test result records of waste analyses kept for 3 years from the last time the waste was sent to a TSDF (on- or off-site)?	Yes	

### G1: General Management for Generators

Rule	Requirement	Compliance Status	Remarks
7045.0208 1	Is hazardous waste properly disposed of?	Yes	
7045.0208 1, E	Does the Regulated Party comply with the POTW requirements for sewer hazardous waste?	Yes	
7045.0294 5	Are the required records (training, analytical results, inspection reports, license renewal app, exception reports, manifests) located at the licensed site and available for inspection?	Yes	
7045.0568 1	Have emergency response arrangements been made with local authorities and outside providers? (fire, police, local hospital, emergency responders)	Yes	
7045.0568 3	Has the Regulated Party documented in its operating record the arrangements made with local emergency authorities?	Yes	
7045.0655 3, A	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, does the owner or operator conduct timely inspections of the unit(s) for malfunction, deterioration, operator error and discharges?	N/A	
7045.0655 3, B	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, does the Regulated Party follow a written inspection schedule for inspection of all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment?		
7045.0655 3, E	If there is an elementary neutralization unit, a pretreatment unit and/or waste water treatment unit, are all applicable inspection (and repair) records (logs) kept for at least 3 years and available on-site?		
7045.0845	Does the Regulated Party properly manage used oil?	Yes	Last shipment was 3/14/13
7045.0895 4	Has used oil accepted from or given to another business to be burned for energy recovery been tested to determine that it is on-specification?	Yes	

G1: General Management for Generators			
Rule	Requirement	Compliance Status	Remarks
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil leaving the generator site for at least three years?	Yes	
7045.0805	Does the Regulated Party properly manage used oil-contaminated waste?	Yes	
7045.0855 4, C	Does the Regulated Party keep records of every shipment of used oil-contaminated waste leaving the generator site for at least three years?	Yes	
7045.0990	Is the Regulated Party properly managing used oil filters?	NO	
7045.0990 3, C, 3	Does the Regulated Party keep records of all used oil filters taken off-site by used oil-filter transporters for at least three years?	N/A	
G1: Preparedness & Prevention			
Rule	Requirement	Compliance Status	Remarks
7045.0566 2	Is hazardous waste managed to prevent or minimize releases?	Yes	
7045.0566 3, A	Is a suitable alarm or communication system in place to provide emergency instructions to Regulated Party personnel?	Yes	
7045.0566 3, B	Is emergency communication equipment available to summon outside emergency responders?	Yes	
7045.0566 3, C	Is fire control equipment, decontamination equipment, and spill control equipment available?	Yes	

### G1: Preparedness & Prevention

Rule	Requirement	Compliance Status	Remarks
7045.0566 3, D	Is water available in adequate volume for fire control (i.e., firehose, sprinkler system and/or foam equipment) ?	Yes	
7045.0566 4	Is emergency equipment tested and maintained?	Yes	
7045.0566 5	Does the Regulated Party provide all personnel involved in hazardous waste being poured, mixed, spread, or otherwise handled with immediate access to an internal alarm or emergency communication device?	Yes	
7045.0566 6	Is aisle space adequate for emergency operations (like fire fighting, spill cleanup, etc)?	Yes	
7060.0600 2	Has the Regulated Party discharged waste or pollutants to the unsaturated zone, through spills, dumping, sewerage or other means?	NO	
7045.0275 2	If the Regulated Party had a release to the environment did the Regulated Party immediately notify the agency?	N/A	
7045.0275 3	If the Regulated Party has had a release, did the Regulated Party recover as rapidly and as thoroughly as possible, any HW that has leaked, spilled, or otherwise escaped a container?		
7045.0855 2, D	Upon detection of a release of used oil to the environment (not originating from a UST) did the Regulated Party stop the release, contain the released used oil, clean up and manage properly the released used oil and other materials contaminated with used oil, and repair or replace any leaking used oil storage equipment prior to returning it to service to prevent future releases?		



G1: Storage Requirements			
Rule	Requirement	Compliance Status	Remarks
7045.0292 1, F	Are hazardous waste containers & tanks properly labeled with the words "Hazardous Waste" and a description that clearly identifies their contents to employees and emergency personnel?	Yes/NO	Incorrect description of the contents in three containers
7045.0292 1, C	Are hazardous waste containers and tanks labeled with the waste accumulation start date and is it visible for inspection? OR Is the accumulation start date recorded in a clear and legible log for non-shipping containers or tanks?	Yes	
7045.0292 1, A	Has the generator stored HW for more than 90 days beyond the waste accumulation start date?		
7045.0292 1, D	Are hazardous waste storage areas (outdoors) protected from unauthorized access and inadvertent damage from vehicles & equipment?	NO	
7045.0292 1, E	Are hazardous waste containers that hold free liquid placed on an impermeable containment surface? If outdoors, is the surface curbed?	NA	
7045.0626 2, A	Are hazardous waste storage containers in good condition and leakproof?	Yes	
7045.0626 2, B	Are there suitable leakproof covers for the hazardous waste containers?		
7045.0626 3	Are hazardous waste storage containers compatible with the waste stored in them?		
7045.0626 4	Are hazardous waste storage containers closed? Are waste containers which can be degraded when exposed to moisture or sunlight covered by an overhead roof or other suitable covering that does not hide the labels?		
7045.0626 5	Are weekly inspections of hazardous waste containers and their storage areas conducted AND documented?		

### G1: Storage Requirements

Rule	Requirement	Compliance Status	Remarks
7045.0626 6	Are incompatible wastes adequately separated?	Yes	
7045.0292 8, B,2	Are satellite accumulation containers properly labeled with "Hazardous Waste" and a clear description of their contents?	Yes/NO	labeled as H.W., but incorrect description of contents in container
7045.0292 8, C,2	For satellite accumulation containers, if located away from the point of generation, are they inspected weekly, and are written records kept?	N/A	
7045.0292 8, D,1	For satellite accumulation containers, is fill date marked on the containers?	Yes	
7045.0292 8, D,2	For satellite accumulation containers, are they moved within 3 days of fill date to storage area?	Yes	
7045.0855 2, C	If used oil is stored, is it stored in containers or tanks that are in good condition, stored on impermeable surfaces, kept closed, and labeled "Used Oil" (including tanks, containers and piping)?	Yes	
7045.0855 2, C	Are wastes contaminated with used oil stored in containers or tanks that are in good condition, on impermeable surfaces, closed, and labeled "Used Oil" or "Used Oily Waste"?	Yes	
7045.0990 3, A	If used oil filters are stored, are they stored in containers that are closed, leakproof and labeled "Used Oil Filters"?	N/A	
273.14 (a)	Are universal waste batteries (each battery), or a battery storage container, labeled with: "Universal Waste-Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies)"?		No batteries on-site
273.13 (a)	Are universal waste batteries (lead acid, NiCad, etc) that show evidence of leakage, spillage, or damage stored in a closed, structurally sound, compatible container?		

G1: Storage Requirements			
Rule	Requirement	Compliance Status	Remarks
273.14 (e)	Are containers of universal waste lamps labeled with: "Universal Waste-Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"?	Yes	
273.13 (d)	Are universal waste lamps stored in closed containers that are structurally sound, adequate to prevent breakage, and compatible? Do containers lack evidence of leakage, spillage, or damage?	Yes	
273.13 (c)	Is mercury containing equipment stored in closed containers that are structurally sound, compatible with the contents of the device? Does the container lack evidence of leakage, spillage, or damage?	N/A	
273.14 (d)	Is mercury containing equipment (i.e. each device) or a container in which the equipment is contained labeled with: "Universal Waste - Mercury Containing Equipment," "Waste Mercury-Containing Equipment," or "Used Mercury -Containing Equipment"?		
G1: Manifests			
Rule	Requirement	Compliance Status	Remarks
7045.0261 1	Are shipments of hazardous waste made without using a manifest? (exceptions for VSQGs)	No	
7045.0261 7	Do manifests contain ALL of the following?: Manifest document number, generator data, transporter data, facility data, waste data, required signatures & dates, and a 24 hour emergency number. (document problem manifests in remarks and Description of Violation)	Yes	
7045.0265 1, D	Have copies of manifests signed by the generator and transporter been sent to the MPCA within five working days of the initial transporter's acceptance of the waste?		
7045.0265 4, A	Have copies of manifests signed by the facility been sent to the MPCA within 40 days of the acceptance of the waste by the facility?		

### G1: Manifests

Rule	Requirement	Compliance Status	Remarks
7045.0298	If applicable, has the generator submitted to the MPCA an exception report for manifest copies not received back from the TSDF within 45 days of the date the waste was initially shipped?	N/A	
7045.0294 1	Are signed facility copies of manifests available for review for 3 years from the date material was accepted by the initial transporter?	Yes	
7045.0302 1	If Regulated Party exports hazardous waste, are all applicable rules being complied with? (notification, consent, EPA acknowledgement of consent, shipping papers or manifests, etc)	N/A	

### G1: Land Disposal Restrictions

Rule	Requirement	Compliance Status	Remarks
268.7 (a), (2)	For waste or contaminated soil that does not meet treatment standards, has the Regulated Party sent a one-time land disposal restriction notification to the receiving treatment or storage facility? Is a copy of the notification available at the Regulated Party's site? Have new notifications been sent when there are changes in waste streams and to any new receiving facilities?	Yes	

### G1: Personnel Training

Rule	Requirement	Compliance Status	Remarks
7045.0558 1	Have employees that manage hazardous waste completed a hazardous waste training program?	Yes	2/11/14
7045.0558 2	Does the Regulated Party have a hazardous waste program director trained in hazardous waste management procedures?	Yes	
7045.0558 3	Does the training program include hazardous waste management and emergency response procedures relevant to the positions held by facility personnel?	Yes	

**G1: Personnel Training**

Rule	Requirement	Compliance Status	Remarks
7045.0558 4	Are new employees trained in hazardous waste management within 6 months of hire or transfer?	Yes	
7045.0558 5	Is refresher training regarding the management of hazardous waste provided at least once per calendar year?	Yes	
7045.0558 6, A	Does the Regulated Party maintain training records which include a job title for each position at the facility related to hazardous waste?	Yes/NO	
7045.0558 6, B	Do the records include a job description for each position related to hazardous waste?	NO	
7045.0558 6, C	Is a written description of the type and amount of training (initial & continuing) documented for each position related to hazardous waste?	NO	
7045.0558 6, D	Has the Regulated Party kept records that document that the initial training and annual review training has been given?	Yes	
7045.0558 7	Have training records been maintained for lifetime of facility (or 3 years after an employee leaves.)?	Yes	

**G1: Contingency Plan**

Rule	Requirement	Compliance Status	Remarks
7045.0572 2	Does the Regulated Party have a contingency plan?	Yes	
7045.0574 1	Does the Regulated Party have an Emergency Coordinator on-site or on-call, and does s/he have authority to act (commit resources?)	Yes	

### G1: Contingency Plan

Rule	Requirement	Compliance Status	Remarks
7045.0572 4, A	Does the contingency plan specify employees' emergency response actions?	Yes	
7045.0572 4, C	Does the plan describe arrangements agreed to with local emergency responders?	Yes	
7045.0572 4, D	Does the plan include up-to-date name, address and Home and Work phone numbers for emergency coordinators?	No	does not include home phone numbers of alternate emergency coordinators
7045.0572 4, E	Does the contingency plan include an up-to-date emergency equipment list?	Yes	
7045.0572 4, F	Is there an evacuation plan for employees that includes signals used to begin evacuation, and primary and alternate evacuation routes?	Yes	
7045.0572 5, A	Is a copy of the contingency plan maintained on-site?	Yes	
7045.0572 5, B	Have copies of the contingency plan been submitted to local authorities and emergency response teams?	No	
7045.0572 6	Has the contingency plan been amended when necessary? (rule change, emerg.eqpt change, process change, emerg. coord. change, plan failed)	Yes	



PHOTOGRAPH: 1

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Production Area

SCENE BEING PHOTOGRAPHED:

5-Color Printing Press

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357





PHOTOGRAPH: 2

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

5-Color Printing Press

SCENE BEING PHOTOGRAPHED:

3-gallon satellite accumulation container of waste petroleum distillates (waste solvent)

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW  
New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357





PHOTOGRAPH: 3

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Production Area (near 5-color printing press)

SCENE BEING PHOTOGRAPHED:

mislabeled 55-gallon satellite accumulation container of  
waste petroleum distillates (waste solvent)

SITE LOCATION:

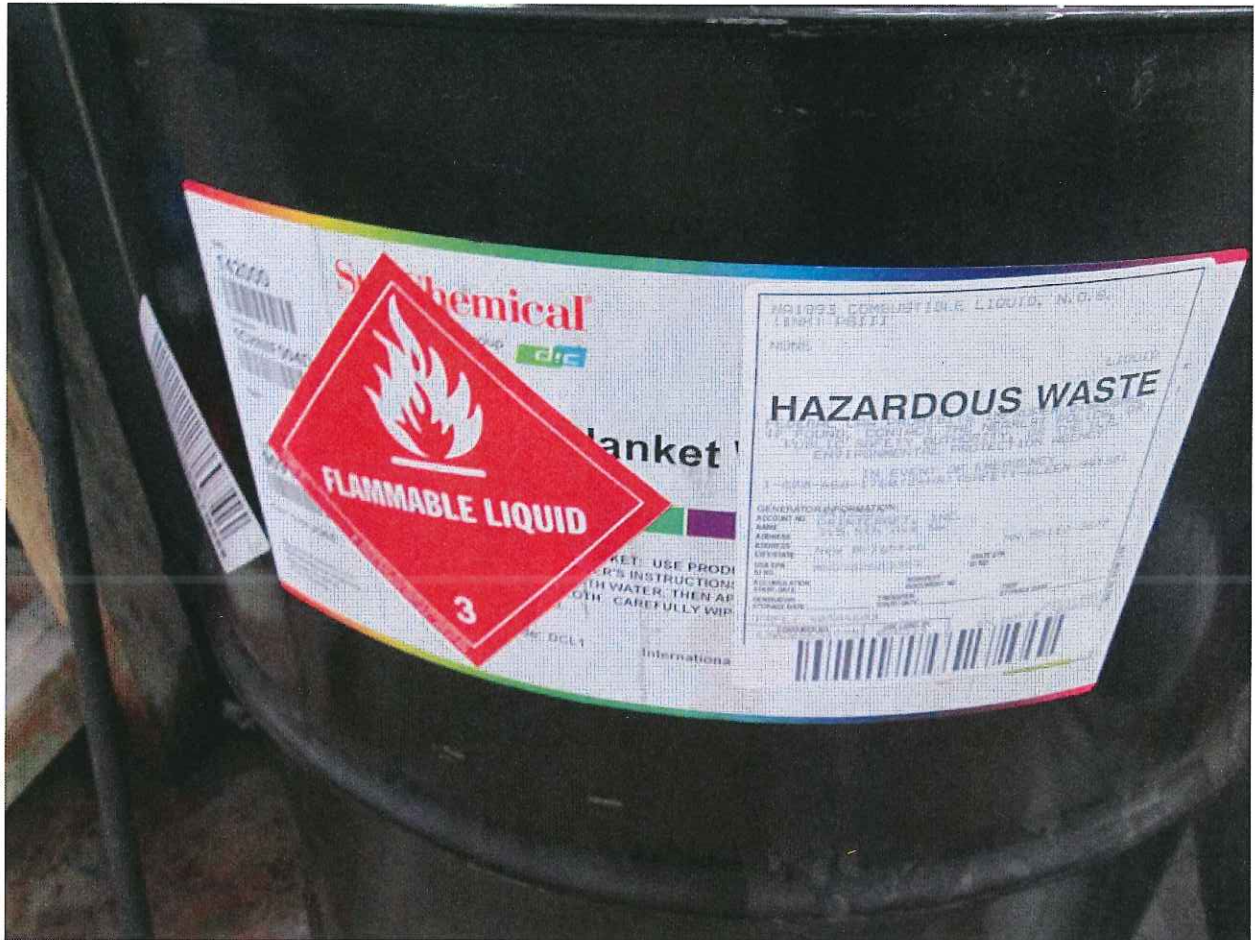
315 5<sup>TH</sup> Avenue NW  
New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357



PHOTOGRAPH: 4

NAME OF PHOTOGRAPHER: Sheila Burrus

DATE OF PHOTOGRAPH: November 12, 2014

LOCATION OF PHOTOGRAPH: Production Area (near 5-color printing press)

SCENE BEING PHOTOGRAPHED: mislabeled 55-gallon container of waste petroleum  
Distillates (waste solvent)

SITE LOCATION: 315 5<sup>TH</sup> Avenue NW  
New Brighton, Minnesota

INSTALLATION NAME: Print Craft, Inc.

INSTALLATION I.D. #: MND 982 623 357





PHOTOGRAPH: 5

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

closed/labeled waste lamps

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

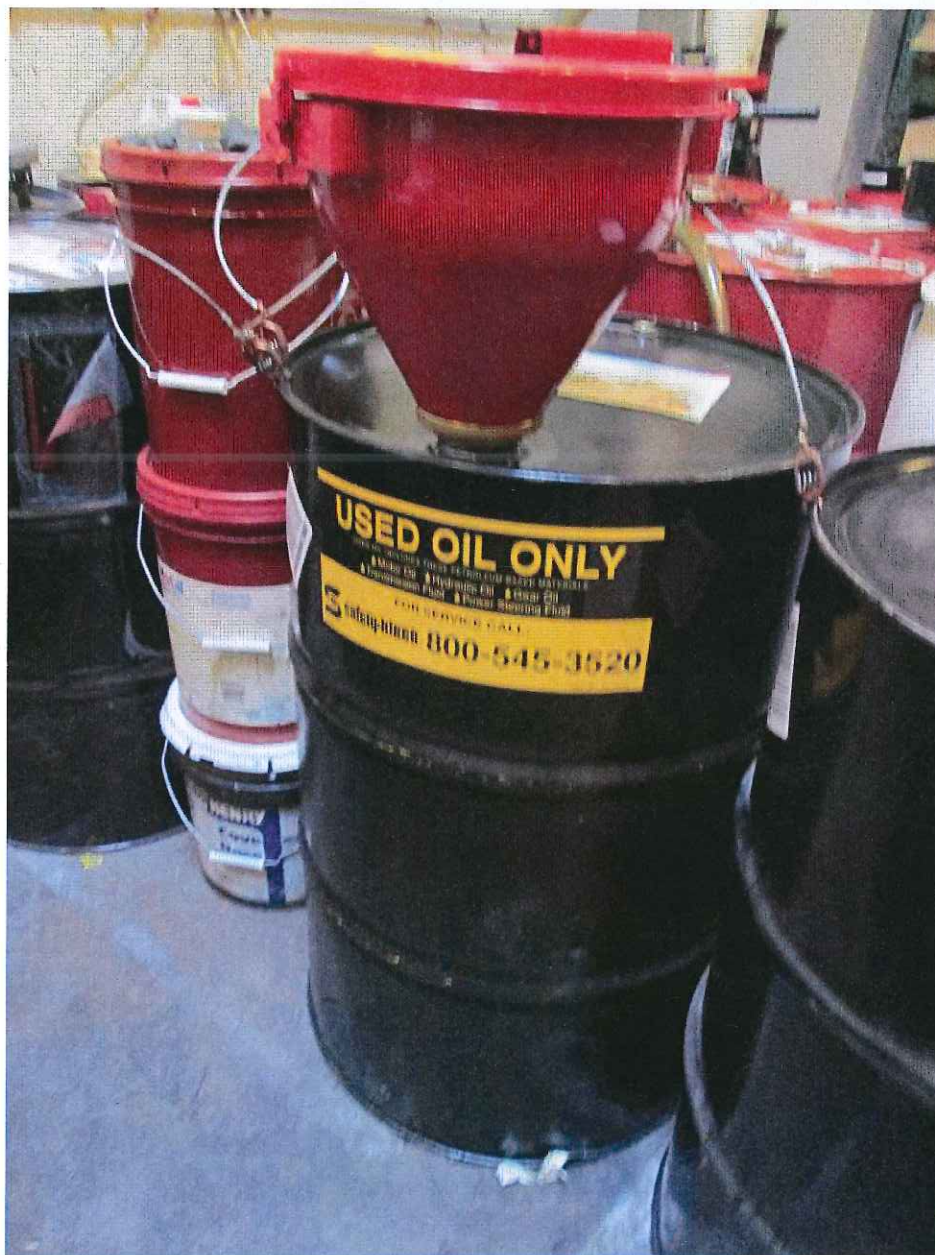
New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357



PHOTOGRAPH: 6

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

closed/labeled 55-gallon drum of used oil

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.



INSTALLATION I.D. #

MND 982 623 357



PHOTOGRAPH: 7

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

closed/labeled partially filled 55-gallon  
container of used oil

SITE LOCATION:

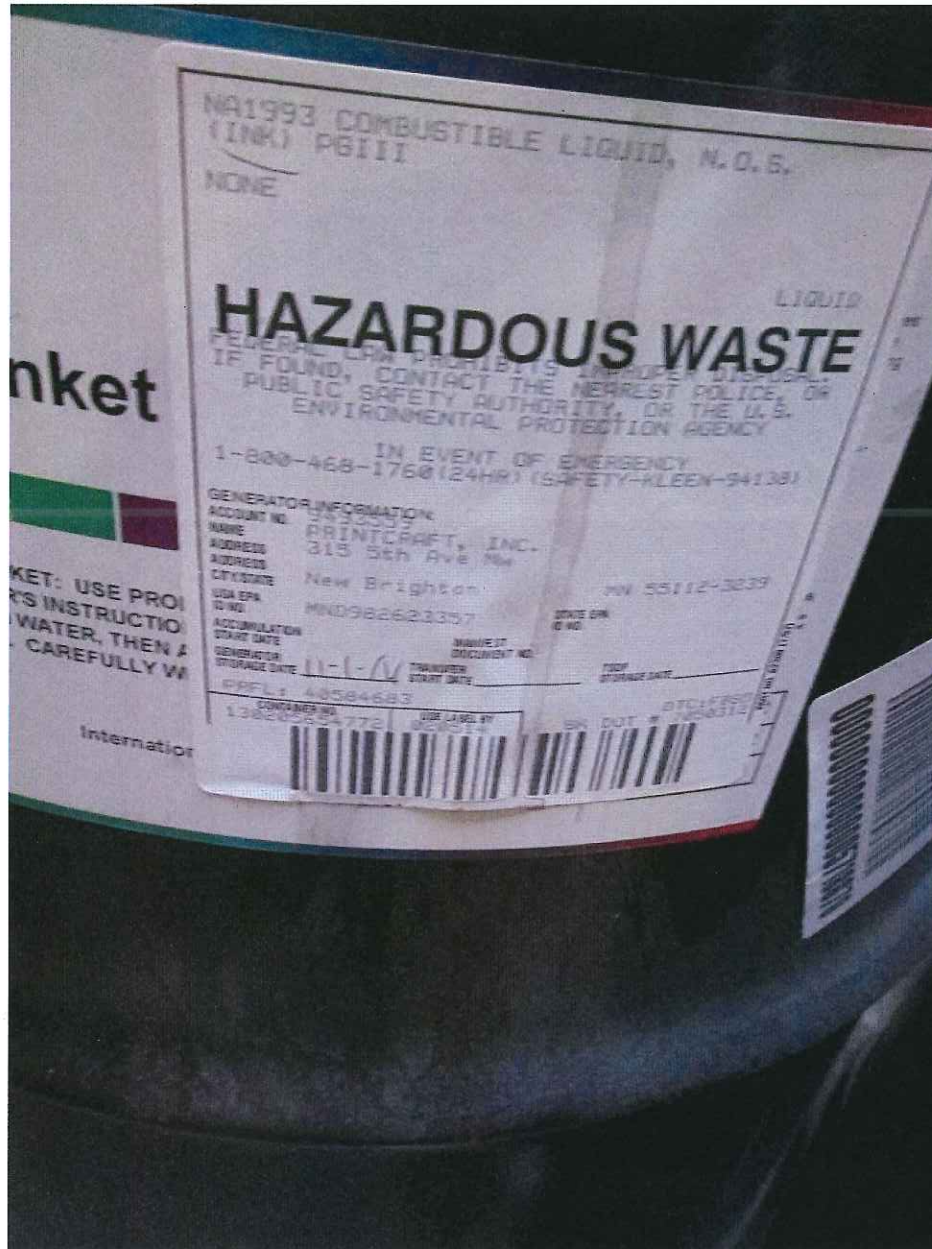
315 5<sup>TH</sup> Avenue NW  
New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357



PHOTOGRAPH: 8

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

re-labeled as waste petroleum distillates

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

New Brighton, Minnesota

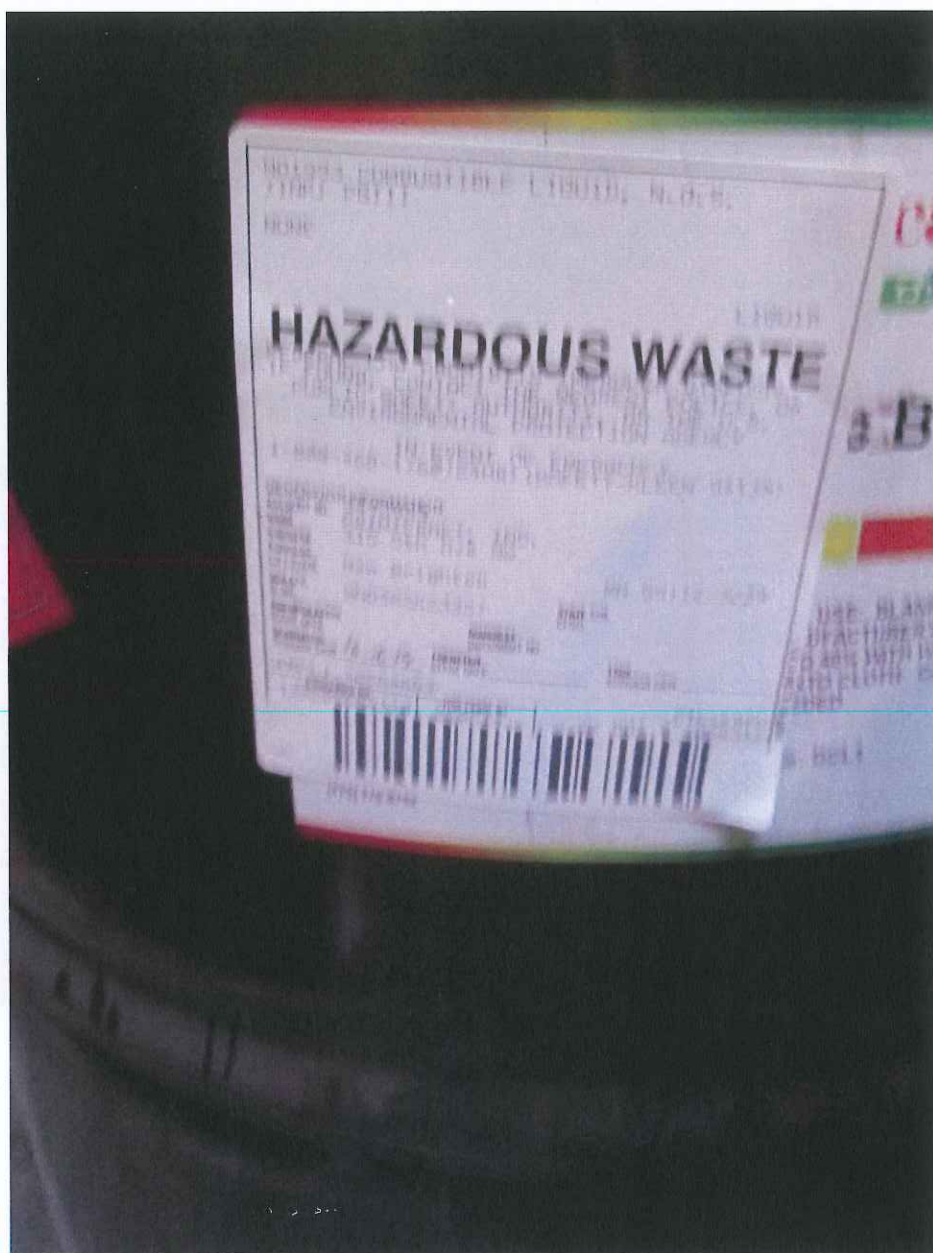
INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357





PHOTOGRAPH: 9

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

re-labeled container as waste petroleum distillates

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

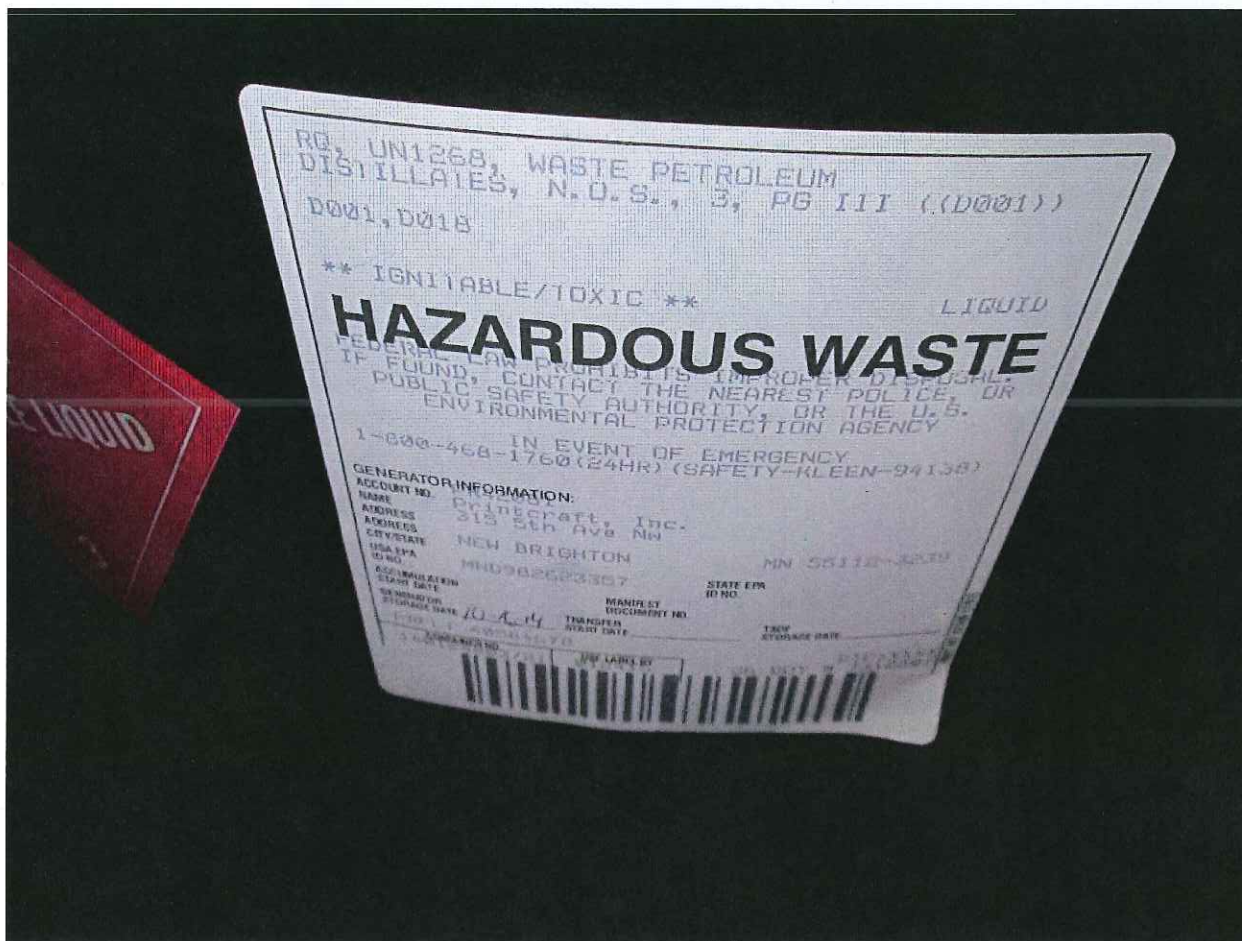
New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357



PHOTOGRAPH: 10

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

re-labeled container as waste petroleum distillates

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

New Brighton, Minnesota

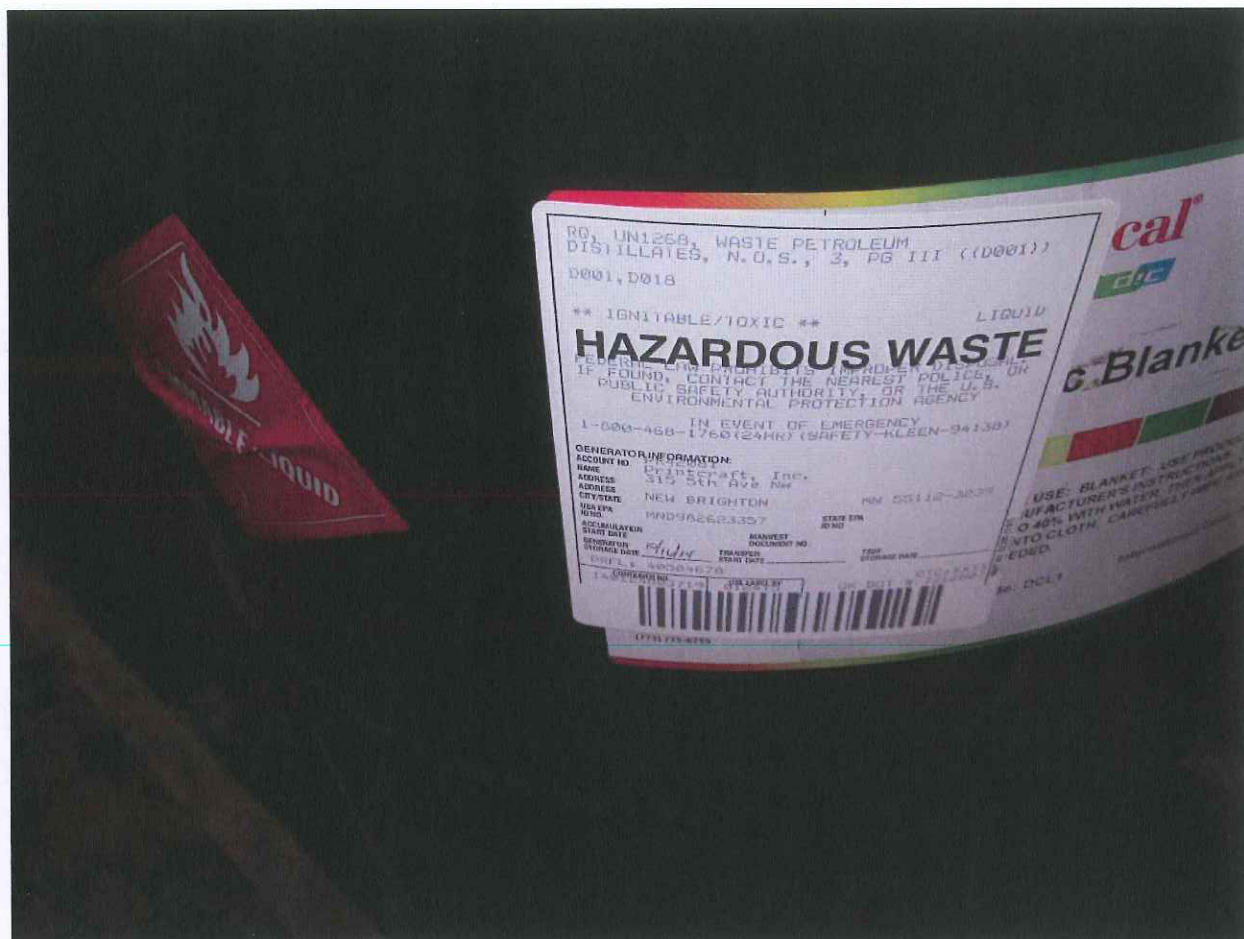
INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357





PHOTOGRAPH: 11

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

re-labeled container as waste petroleum distillates

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

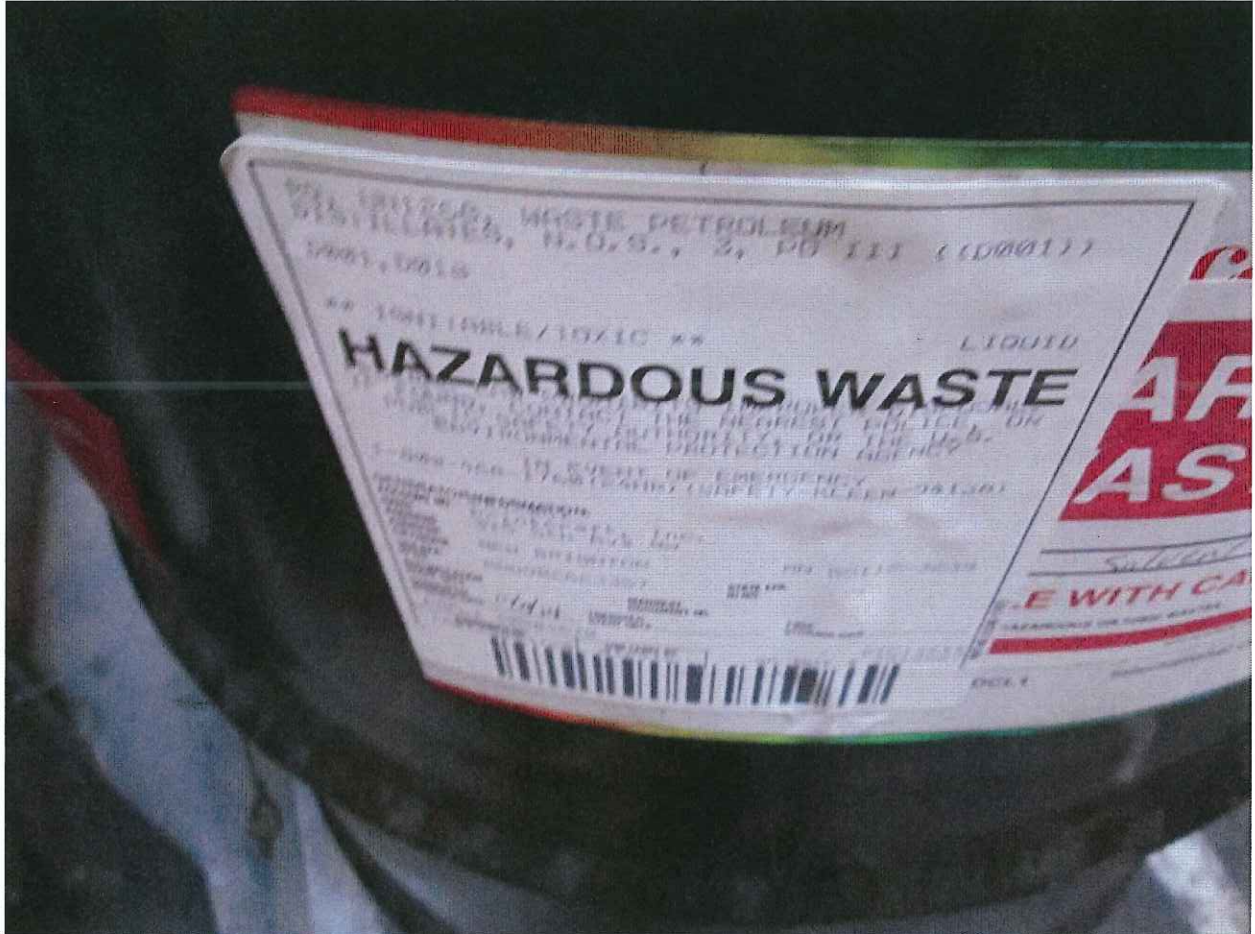
New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357



PHOTOGRAPH: 12

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

re-labeled as waste petroleum distillates

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW  
New Brighton, Minnesota

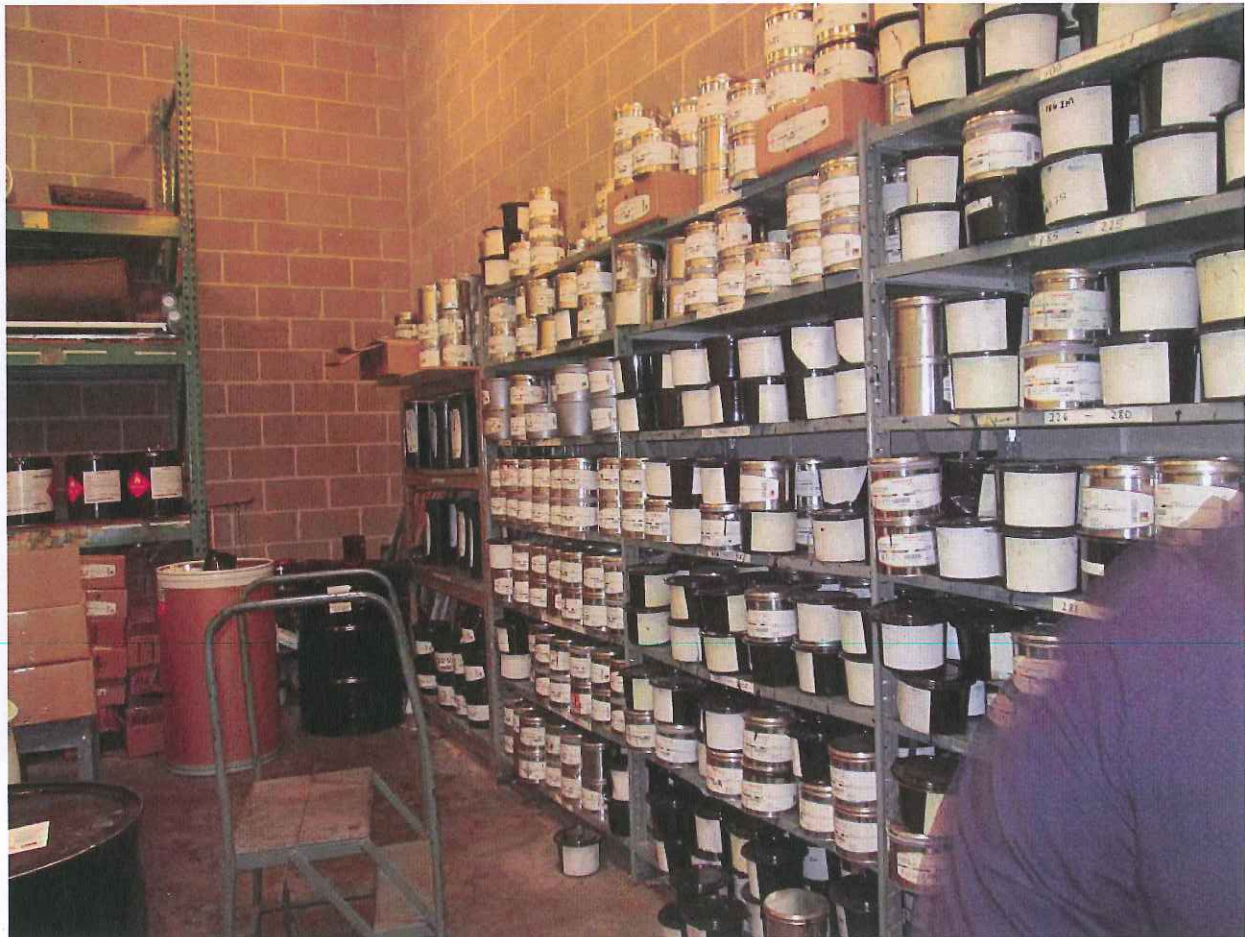
INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357





PHOTOGRAPH: 13

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

raw materials

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357



PHOTOGRAPH: 14

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

raw materials (inks)

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW  
New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357





PHOTOGRAPH: 15

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

raw materials (oil, solvents/inks)

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

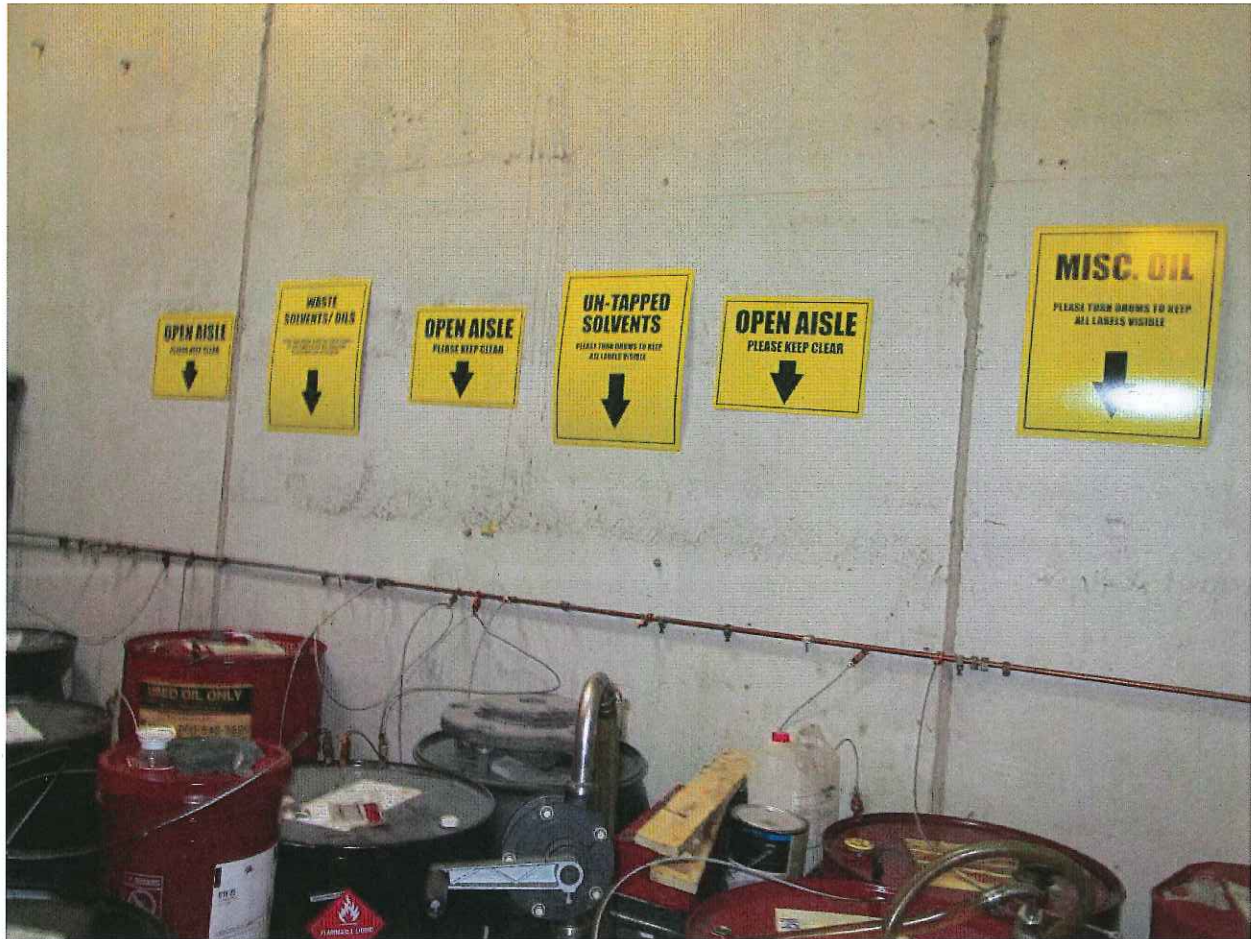
New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357



PHOTOGRAPH: 16

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Chemical Storage Area

SCENE BEING PHOTOGRAPHED:

raw materials

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW  
New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357





PHOTOGRAPH: 17

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Warehouse

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

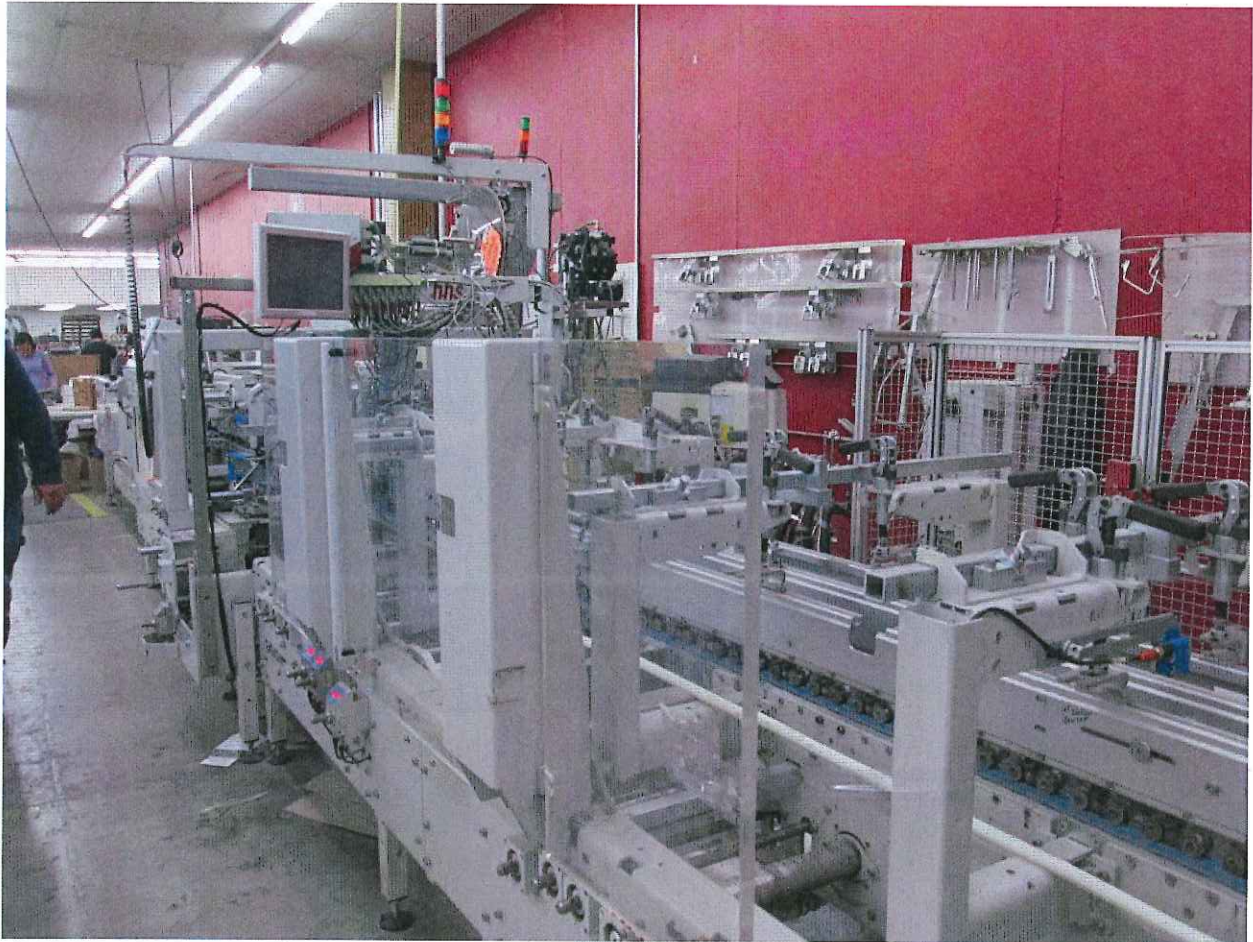
New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357



PHOTOGRAPH: 18

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Gluing Department

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357





PHOTOGRAPH: 19

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Stitching Department

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW  
New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357



PHOTOGRAPH: 20

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Stitching Department

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357





PHOTOGRAPH: 21

NAME OF PHOTOGRAPHER:

Sheila Burrus

DATE OF PHOTOGRAPH:

November 12, 2014

LOCATION OF PHOTOGRAPH:

Folding Department

SITE LOCATION:

315 5<sup>TH</sup> Avenue NW

New Brighton, Minnesota

INSTALLATION NAME:

Print Craft, Inc.

INSTALLATION I.D. #

MND 982 623 357



PHOTOGRAPH: 22

NAME OF PHOTOGRAPHER:

DATE OF PHOTOGRAPH:

LOCATION OF PHOTOGRAPH:

SITE LOCATION:

INSTALLATION NAME:

INSTALLATION I.D. #

Sheila Burrus

November 12, 2014

Cutting Department

315 5<sup>TH</sup> Avenue NW

New Brighton, Minnesota

Print Craft, Inc.

MND 982 623 357